



U.S. Department of Justice

*United States Attorney
Southern District of New York*

MEMO ENDORSED

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

January 19, 2023

BY ECF

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Raymond White*, 21 Cr. 660 (ER)

Dear Judge Ramos:

The Government respectfully writes to advise the Court that the parties have conferred and agreed to a proposed schedule with respect to the exchange of certain material and information prior to and during trial currently scheduled for February 21, 2022. The proposed schedule for the Court's consideration, which the parties request the Court to enter, is as follows:

January 23, 2023

The Government provides notice to the defendant of evidence it may seek to offer pursuant to Federal Rule of Evidence 404(b).

The parties provide notice to each other, consistent with the requirements of Federal Rule of Criminal Procedure 16, of experts potentially to be called, if any, during the Government's case-in-chief and the defendant's case.

The Government starts producing non-testifying witness material.

January 31, 2023

The parties file their proposed requests to charge and proposed *voir dire* for jury selection.

The parties provide notice to each other, consistent with the requirements of Rule 16, of rebuttal experts, if any.

February 3, 2023

The parties file motions *in limine*.

The parties provide each other a list of witnesses whom the parties reasonably expect to call in its case-in-chief. The witness list will be subject to good-faith revision as the parties prepare its case for trial.

The parties provide each other a list of exhibits that the party reasonably expects to seek to introduce during its case-in-chief. This exhibit list will be subject to good-faith revision as the parties prepare its case for trial.

February 7, 2023

The Government provides to the defendant material covered by 18 U.S.C. § 3500, including material pursuant to *Giglio v. United States*, 405 U.S. 150 (1972).

Defense counsel provides to the Government material covered by Federal Rule of Criminal Procedure 26.2.

February 10, 2023

The parties file oppositions to motions *in limine*.

Week of February
13, 2023

Final Pretrial Conference

February 21, 2023

Beginning of Trial

The proposed schedule is approved. A final pretrial conference will be held on February 16, 2023 at 2:00 p.m.
SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 1/20/2023

New York, New York

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/

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cc: Counsel of Record (by ECF)